



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-3000

OFFICE OF ADMINISTRATION

MAY 2 9 2019

Mr. Austin Evers
Executive Director
American Oversight
1030 15th Street, NW
Washington, DC 20005

RE: Freedom of Information Act Request
FOIA Control No.: 19-FI-HQ-00903

Dear Mr. Evers:


This letter is an interim response to your Freedom of Information Act (FOIA) request dated and received on March 29, 2019. You asked for copies of all Department of Housing and Urban Development communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp)) regarding ethical issues or restrictions affecting Lynn Patton's potential appearance on or participation in a reality television show, between October 1, 2018, and March 1, 2019.

Your request is granted in part. Enclosed are copies of correspondence between Ms. Patton and the Office of General Counsel related to Ms. Patton's potential participation in a reality television show. The Department is utilizing an electronic discovery search to locate additional responsive materials, and will provide a final response at the completion of that process. All applicable appeal rights will be provided in the final response letter.

For your information, your FOIA request, including your identity and any information made available, is releasable to the public under subsequent FOIA requests. In responding to these requests, the Department does not release personal information, such as home address, telephone number, or Social Security number, all of which are protected from disclosure under FOIA Exemption 6.

If you have questions regarding your request, please contact Mr. Ethan Bodell at (202) 402-3450. Thank you for your interest in the Department's programs and policies.

Sincerely,

for 

Deborah R. Snowden
Deputy Chief FOIA Officer
FOIA Branch
Office of the Executive Secretariat

Enclosure

From: Patton, Lynne M
Sent: Tuesday, October 23, 2018 10:46 AM
To: Allen, Lindsey A; Cruciani, Linda M; Petty, Timothy J
Cc: Hunter, Matthew F; Hughes, Andrew; Barton, Victoria L; Simmons, Ventura A; Levin, Erica; Murphy, Stephen E; Smyth, Timothy M; Alvarez, Olga R; Thompson, Amy C
Subject: Ethics Guidance (Truly Original Productions)
Attachments: Truly Original Productions Pitch.pdf; Truly Original Questions (Ethics Guidance) .docx

Dear Lindsey, Linda & Tim:

Per our conversation of October 10th, attached please find ten (10) potential ethics questions for your consideration & guidance.

If it helps, Truly Original Productions confirmed that monetary compensation would not begin until filming starts (Summer 2019), but that I would be required to sign a short "shopping agreement" prior to the reel being pitched to all networks (Winter 2018) at which time we would be required to sign an official contract upon sale to network.

As always, please do not hesitate to contact me, should you have any immediate questions.

Thank you,
Lynne

To Whom It May Concern:

I'm the VP Of Development at Truly Original. We're an Emmy award-winning production company based out of Manhattan, specializing in unscripted content. With over 20 series currently on the air and a diverse library of hits (everything from *Season 25: Oprah Behind the Scenes*, *Ink Master*, and *Vanity Fair Confidential* to Bravo TV juggernauts like *The Real Housewives of Atlanta*, *Shahs of Sunset* and *The Real Housewives of Potomac*) we feel it's our unique storytelling ability that sets us apart from the rest.

I am reaching out because I'm interested in developing a new television project that explores diversity in the Republican Party. It's a thriving world, and I don't think it's been represented to its fullest potential. I would like the opportunity to do so.

Our proposed idea would be a documentary series featuring a group of powerful women (like **Lynne Patton** and **Katrina Pierson**) who have given a voice to the minority population in politics. After extensive conversations with these women, their personal stories and career tracks prove to be incredibly compelling.

Through our initial research, it's become clear that there is a real group of diverse women who are friendly with each other, have the same political beliefs, and can articulate the issues we're facing in America right now. We would like to follow their day-to-day, capturing who they are at home, at work, and above all, understanding their political views and their strong sisterhood.

Right now, in entertainment, news and digital arenas, no one is telling this story, and the time has come to bring it in front of a mass audience. We would plan to explore Netflix as a potential home for this project, as well as other premium platforms like Hulu and HBO. We would also present it to prominent cable buyers like Bravo and Lifetime.

Proposed Timeline:

Casting - This process will take roughly one month. This will entail interviewing potential participant, conducting on-camera casting interviews, and gathering research.

Pitching - Once we have made our initial participant selections, we will create presentation materials such as a video reel and a deck that outline the individuals being featured as well as the series creative

Series Shoot - Dates and logistics would be worked out subsequent to a series pick-up

Truly Original looks forward to exploring this further, and working together to make a project we all can be proud of.

All My Best,
Chelsey Stephens

Truly Original
VP Of Development & Talent
Stephens@TrulyOriginal.com
212-763-3616

DATE: October 18, 2018

MEMORANDUM FOR: J. Paul Compton, Jr., General Counsel
Tim Petty, Senior Counsel, General Counsel
Linda M. Cruciani, Deputy General Counsel for Operations
Lindsey Allen, Assistant General Counsel, Ethics and Appeals
Ventura Simmons, Regional General Counsel, Region II
Erica Levin, Deputy Regional General Counsel, Region II

FROM: Lynne M. Patton, Regional Administrator, Region II

CC: Benjamin Carson, Secretary
Pamela Patenaude, Deputy Secretary
Matthew Hunter, Assistant Deputy Secretary

SUBJECT: Ethics Guidance

This memorandum serves as a series of questions that are likely to arise should I choose to pursue the offer made to me in April 2017 by Truly Original Productions, a subsidiary of Endemol Shine North America, to be a primary participant in a “docuseries” about minority Republicans for a primetime series on Netflix, HBO, Bravo, Hulu or Lifetime (see attached).

It should be noted that I was initially approached by Truly Original Productions with this opportunity in December 2016, prior to becoming a government employee.

In the interest of public service to the President of the United States, I declined.

Now that I have a better understanding of the boundaries, ethical responsibilities, potential conflicts, rules and regulations of government employees (and in consideration of gainful employment post-Administration in the private sector), I wish to revisit the same with your collective guidance.

On October 10, 2018, I met with Linda Cruciani, Lindsey Allen and Tim Petty to discuss the same and subsequently derived the following questions:

1. Given the monetary cap of \$28,000 per year on secondary income for federal employees, would I be able to take an official “unpaid leave of absence” and receive compensation in excess of that amount from Truly Original Productions for the estimated two (2) months of filming time, or would I still be subject to all government rules/regulations?
2. Given the monetary cap of \$28,000 per year on secondary income for all federal employees, would I be able to temporarily resign my post as Regional Administrator, Region II, at the outset of filming (Summer 2019) and legally be re-hired in that post upon completion of the estimated two (2) months production time?
3. In consideration of the aforementioned scenario in Question 1 (unpaid leave), would monetary and/or travel compensation from Truly Original Productions during the estimated two (2) months of filming time that is determined to be valued above the reporting threshold, be required to be disclosed on my annual financial disclosure report (OGE-278e), once I returned to public service?

4. In consideration of my pre-existing relationship with the Trump family, would HUD have any objection to my attendance at various events or non-HUD related meetings at the White House during my official unpaid leave for production by Truly Original Productions (with White House permission)?
5. Would I be allowed to refer to myself (or would the show be permitted to refer to me) as a current member of the Trump Administration - not by my specific HUD title – if on official unpaid leave?
6. In consideration of the aforementioned scenario in Question 1 (unpaid leave) and my pre-existing relationship, would I be permitted to attend Trump 2020 Campaign rallies for documentation on the show by Truly Original Productions? If so, who is allowed to cover my travel expenses? Me, as a private individual? Truly Original Productions? Trump 2020 Campaign? All of the above?
7. Given my pre-existing relationship with Secretary Carson, am I permitted to have dinner with him (and/or his family) during our personal time, as documented by Truly Original Productions?
8. Given my pre-existing relationship(s) with the Trump family and several high-ranking officials of the Trump Administration, am I permitted to have dinner with any member of the Trump family and/or Kellyanne Conway, etc, during our personal time, as documented by Truly Original Productions?
9. In the likely event that my personal name recognition and/or physical recognition significantly increases as the result of my participation in this Truly Original Productions primetime docuseries, is it considered “undue influence” or even a “campaign violation” should public or media interest in my official HUD duties, tours, keynote speeches, official Twitter account, subsequently increase once I returned to public service?
10. The potential primary cast consists of myself, Katrina Pierson, Candace Owens, Stacey Dash & Star Parker. At my request, they will also be interviewing Deana Bass, former HUD Deputy Chief of Staff. Given the fact that Deana and I met in the capacity of our official HUD duties, is there any conflict with her and I appearing in a Truly Original Production together during our mutual personal time, now that she is in the private sector?

From: Simmons, Ventura A
Sent: Monday, February 11, 2019 11:25 AM
To: Patton, Lynne M
Cc: Murphy, Stephen E; Allen, Lindsey A; Levin, Erica
Subject: shopping Agreement

Lynne,

We don't have any legal objection to the shopping agreement.
Please let us know the next steps before you enter into any other agreements or amend this one.

Ventura Simmons
Regional Counsel
US Department of Housing and Urban Development
Office of Regional Counsel, Region II
26 Federal Plaza, Room 3500
New York, NY 10278
(212) 542-7204

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